Comments regarding WT Docket No. 01-289, FCC 13-2 – 31 Mar 13

I have been a pilot for 19 years, I own my own aircraft, and flying has been my primary source of income for the past 15 years. I am writing because I feel the need to point out some disconnects that are obvious from my point of view.

1) **Economic Realities—Put money into preventing crashes, not finding them**. The vast majority of airplanes affected by this proposed rulemaking are privately owned 2-4 place aircraft with an average value around $35,000. You are forcing owners to spend $2000 "in the interest of safety" in order to maintain the airworthiness of their investment. We are talking about single engine airplanes which were manufactured in the 1960's and 1970's. 10 year old avionics are considered new, 20 year old avionics are pretty good, and 30 year old avionics are par for the course. The economy is in a slump, and gas prices are higher than ever. If you ask a pilot to spend $2000 to improve safety, (s)he will put the money into:
    a. Maintenance (probably towards the engine)
    b. Situational awareness tools (GPS moving map, inflight weather display, or collision avoidance device)
    c. Flight training.

    These are things that will prevent a crash. An Emergency Locator Transmitter (ELT) will only help authorities find the site of the crash (if it works).

2) **Stay in your Lane – The FAA handles Aviation Safety.** There are three issues here: Certification, Manufacture, and Use. 121.5 is a universally allocated emergency frequency—SPECTRUM MANAGEMENT IS NOT AN ISSUE. As we furlough federal employees, we need to take a close look at areas where duplication of effort is taking place.
    a. Certification - This is squarely a FCC issue. If the budget does not allow certification of depreciated technology, then do not waste the money.
    b. Manufacture - This should be left up to market forces. Most manufacturers will likely cease production because of lower profit margins. Eventually legacy 121.5 MHz ELTs will be impossible to produce due to parts availability.
    c. Use – This is what the FAA is paid to decide. What is the definition of use? Is it installed? Armed? Transmitting? How is this going to be enforced?

3) **Other Competing Technologies**
    a. **Cell Phones – When the requirement for an ELT was created, cell phones did not exist.** If you survive a plane crash, your best chance of a quick rescue is a cellphone and 911—a direct line between the subscriber and the local emergency personnel. With a 406 MHz ELT, the unit has to activate and a satellite has to relay a signal to a search and rescue center, which has to coordinate with Civil Air Patrol (CAP), local law enforcement, etc. It is a one way beacon, it could be a false alarm, and there is no way to ascertain the needs of the crew or passengers. It is also important to note that the CAP often uses cell phone "pings" to locate crash sites where even the ELT did not survive.
    b. **Flight Following – Talking to air traffic control.** Flight plans provide a search area, but voluntarily participating in the air traffic control system under Visual Flight Rules is free of cost, does not require any new equipment, offers information that may prevent a crash, and provides an immediate indication of a crash along with a location which can immediately be passed to rescue personnel. Survivors of the crash will likely be able to maintain contact with air traffic control by relaying through other aircraft on the frequency.
    c. **ADS-B – Automatic GPS position reports into the air traffic control system, with emergency alerting codes.** Even if you are not talking to air traffic control, they can see your exact position, aircraft identifier & pilot selected emergency codes.
    d. **EPIRBs – Emergency Position Indicating Radio Beacons that use the Search and Rescue Satellite system.** Cell phones do not work everywhere, and planes are not the only way to get into a survival situation in the middle of nowhere. EPIRBs and other commercial equivalents provide a cost effective solution. Imagine flying to Alaska to go hunting. Why not spend your money on an EPIRB that can be used in the plane and in the woods?

4) **TimeLine - One year is not enough.** The FAA provided 8 years for the fleet to install ADS-B and the FCC thinks we can replace all of our ELTs in 1 year? When we went from 360 channel radios to 720 and 760, the FCC gave us more than a year, and that affected only a small portion of the fleet.

Please consider the economic and political consequences of your decision, and thank you for providing me with an opportunity to comment.

Respectfully,

Paige Hoffart